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5 Counsel for Defendant CONRAD

6
7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA,
10 Plaintiff,

11 vs.

12 SADELL CONRAD,
13 Defendant.

)
) No. CR 05-0595 WHA
)

) **STIPULATION AND ~~PROPOSED~~**
) **ORDER CONTINUING**
) **SENTENCING DATE**
)

) Date: March 28, 2006
) Time: 2:00 p.m.
) Court: The Honorable William H. Alsup
)

14
15
16 STIPULATION

17 The parties agree to continue the above referenced sentencing from March 28, 2006, until April
18 11, 2006 at 2:00 p.m. The purpose of the continuance is due to the fact that counsel for Mr. Conrad
19 will not be available for the entire month of March, as she will be out of the country on her
20 honeymoon. Counsel for Mr. Conrad cannot prepare a sentencing memorandum in a timely way
21 under the current schedule, as such a memorandum would be due on March 21, 2006, and she will be
22 out of the county at that time. Counsel needs a sufficient amount of time to prepare for the
23 sentencing in this matter upon her return, and is in the midst of securing mitigating evidence from Mr.
24 Conrad's friends and relatives to prepare for the sentencing. Counsel thus has multiple individuals to
25 interview in preparation for the sentencing, and she cannot obtain all the necessary evidence before
26 she leaves on February 28, 2006.

For these reasons, counsel requests April 11, 2006 as the final sentencing date in this matter.

The government has no objection to the proposed date. United States Probation Officer J.D. Woods has been informed about the request to continue the sentencing in this matter, and has no objection to the defendant's request for a continuance. Defense counsel will ensure that Mr. Woods receives a copy of this Court's order, should the Court grant the request.

IT IS SO STIPULATED

DATED: 2-16-06

Elizabeth M. Falk
ELIZABETH M. FALK
Assistant Federal Public Defender

DATED: 2-16-06

Thomas Mazzuco
THOMAS MAZZUCO
Assistant United States Attorney

~~[PROPOSED]~~ ORDER

Based upon the aforementioned representations of the parties, and for good cause shown, it is hereby ORDERED that the sentencing proceedings for defendant Sadell Conrad are hereby CONTINUED until April 11, 2006, at 2:30 p.m. The sentencing date of March 28, 2006 is hereby vacated.

DATED: February 21, 2006

